

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

DAVID WILLIAM WOOD,	)	
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO.: 3:15-cv-594
	)	
EQUIFAX INFORMATION SERVICES,	)	
LLC, Et al.,	)	
	)	
	)	
Defendants.	)	
_____	)	

VIDEOTAPED DEPOSITION OF  
PERSON MOST KNOWLEDGABLE OF CREDIT ONE BANK,  
ALEXANDRA CHU  
LAS VEGAS, NEVADA  
WEDNESDAY, MAY 11, 2016  
10:04 a.m. - 1:44 p.m.

REPORTED BY: JOHANNA VORCE, CCR NO. 913

ALEXANDRA CHU - 5/11/2016

1 VIDEOTAPED DEPOSITION OF PERSON MOST KNOWLEDGABLE  
2 OF CREDIT ONE BANK, ALEXANDRA CHU, taken at 3770 Howard  
3 Hughes Parkway, Suite 300, Las Vegas, Nevada 89169,  
4 on Wednesday, May 11, 2016, at 10:04 a.m., before Johanna  
Vorce, Certified Court Reporter, in and for the State of  
Nevada.

5

APPEARANCES:

6

For the Plaintiff:

7

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CREDIT ONE BANK

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28

Also Present:

29

The Videographer, Jacob Florez

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1	I N D E X	
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1	A.	Yes.	10:24:39
2	Q.	Do you still process ACDVs?	10:24:48
3	A.	No.	10:24:51
4	Q.	You mentioned that you went back to school at some	10:24:59
5		point after high school. Did you go to college?	
6	A.	Yes.	10:25:13
7	Q.	And when did you go to college?	10:25:15
8	A.	I started January of 2011.	10:25:18
9	Q.	And where did you go?	10:25:24
10	A.	Nevada State College in Henderson, Nevada.	10:25:26
11	Q.	And were you a full-time student?	10:25:32
12	A.	Yes.	10:25:34
13	Q.	And were you pursuing a degree -- a degree	10:25:38
14		program?	
15	A.	Yes, for psychologist.	10:25:41
16	Q.	And what was that de- -- okay.	10:25:44
17		Did you complete your college degree?	10:25:46
18	A.	No.	10:25:49
19	Q.	How long did you attend Nevada State?	10:25:54
20	A.	Two and a half years.	10:25:58
21	Q.	Have you attended any other colleges or schools	10:26:15
22		after Nevada State?	
23	A.	No.	10:26:20
24	Q.	Have you obtained any certificates or any kind of	10:26:23
25		licensure --	

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1	A.	No, I haven't.	10:26:30
2	Q.	-- after high school?	10:26:31
3	A.	No, I haven't.	10:26:33
4	Q.	What is Credit One?	10:26:39
5	A.	Credit One --	10:26:42
6		MR. SEARS: Do you understand the question? I	10:26:46
7		don't know that I understand the question.	
8		MS. ROTKIS: Just let her.	10:26:52
9		MR. SEARS: Objection to form.	10:26:54
10		BY MS. ROTKIS:	10:26:55
11	Q.	Okay. Ms. Chu, if you don't understand one of my	10:26:55
12		questions, you can say, "I don't understand your question,"	
13		and I'll try to make it clearer for you, okay? But I think	
14		it's an improper objection.	
15		So what is Credit One Bank?	10:27:07
16	A.	In regards to what they do, or --	10:27:10
17	Q.	What is your understanding of what Credit One Bank	10:27:13
18		is?	
19		MR. SEARS: Objection as to form.	10:27:17
20		BY MS. ROTKIS:	10:27:22
21	Q.	You may answer.	10:27:22
22	A.	It's a credit card company issuing credit to those	10:27:25
23		who need credit restoration help, from my understanding.	
24	Q.	Do you know whether Credit One issues any other	10:27:41
25		type of credit other than credit cards?	

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1	A.	I'm not aware if they do, no.	10:27:47
2	Q.	Please tell me about how you were trained to	10:27:52
3		investigate fraud on new applications?	
4	A.	That was side-by-side training, as well. And the	10:28:09
5		training involved me in looking at Experian, looking for	10:29:35
6		inconsistencies in Social Security numbers and addresses,	
7		things that don't fit the profile of the cardholder.	
8	Q.	Who taught you how to look at Experian to see	10:28:35
9		whether new applications might not fit the profile of the	
10		cardholder?	
11	A.	That was Sandra Moore, as well.	10:28:43
12	Q.	Is there anything else that you did to investigate	10:28:46
13		new applications?	
14	A.	Other than send out for validation, trying to get	10:28:53
15		in contact with the cardholder to see if they were the ones	
16		who actually applied for the credit card.	
17	Q.	How did you try to get in touch with cardholders	10:29:05
18		to see if they were the ones who applied for the card?	
19	A.	We would pend the application and send them a	10:29:12
20		letter for validation.	
21	Q.	Did you ever call cardholders on the phone?	10:29:18
22	A.	No.	10:29:21
23	Q.	What did you do to investigate whether an address	10:29:28
24		change indicated fraud?	
25	A.	I'm sorry. Can you repeat that?	10:29:35

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1 Q. What did you do to -- to learn how to investigate 10:29:39  
2 whether an address change indicated there might be fraud?

3 A. We would look through our Experian application to 10:29:47  
4 see if that address has ever been associated with the  
5 cardholder. We would also look in Accurint as well to see 10:31:28  
6 if there were any types of utilities or car registration,  
7 driver's license, things to that nature under the  
8 cardholders -- under the cardholder to see if it linked to  
9 them.

10 Q. What were you trained to do to investigate whether 10:30:27  
11 a Social Security change -- a Social Security number change  
12 indicated fraud?

13 A. That would also be pulled through Experian as well 10:30:40  
14 to see if we when we pull that Social Security number up, it  
15 matched to the cardholder. If it didn't, it would be  
16 blocked.

17 Q. How did you block it? 10:30:57

18 A. There was a -- a block placed on the account by 10:30:59  
19 the bank restricting the card access, and then we would --

20 Q. And then what? 10:31:08

21 A. -- and then we would send a letter to the 10:31:09  
22 cardholder as well asking them for the reason why that it  
23 was updated to a different Social Security number.

24 Q. And then what would happen after that? 10:31:26

25 A. After that, my process was done. The corre- -- if 10:31:28

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1 they sent any correspondence back, would go through a 10:31:28  
2 different department, so I didn't handle anything from that  
3 point going forward.

4 Q. Okay. Do you know what department that 10:31:43  
5 correspondence would go to? 10:33:15

6 A. I believe it's just called "correspondence 10:31:47  
7 department."

8 Q. Oh, okay. And do you know anybody who works 10:31:50  
9 there?

10 A. I don't. 10:31:53

11 Q. Okay. You mentioned that too many cards with the 10:31:55  
12 same address might indicate fraud. Tell me how you learned  
13 to investigate whether there were too many cards with the  
14 same address that might indicate fraud.

15 A. The same way. It would be side by side. We would 10:32:16  
16 pull up every account that had that address and see if any  
17 other type of suspicious activity was going on, determine if  
18 it could be or could not be fraudulent at that point.

19 Q. What would indicate a suspicious activity? 10:32:36

20 A. Very large transactions out of their normal 10:32:49  
21 spending, multiple changes on the account within short  
22 period of time frames, phone numbers when looked up in the  
23 system didn't match to anybody, it was a -- a number that  
24 wasn't registered to anybody. Those were some of the flags.

25 Q. Okay. When you say "in the system," what system 10:33:15

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1	are you talking about?	10:33:15
2	A. I'm sorry. It's Accurint.	10:33:17
3	Q. Okay. Are there any other systems that you used	10:33:20
4	to investigate the possibility of fraud?	
5	A. Yes. Externally, it would have been things like	10:33:28
6	Accurint, Experian. There was a Speedpay application for	
7	debit card transac- -- or payments. I'm sorry. And then a	
8	system for ACH payments, and then another system for	
9	physical checks sent through the mail, as well. As well as	
10	our internal applications, as well.	
11	Q. Do you recall the names of any of the internal	10:34:03
12	applications?	
13	A. CAPS, CASH, Remitco, CAPS, and that -- that's all	10:34:08
14	that I remember.	
15	Q. How about for physical payments that came in to	10:34:23
16	the bank?	
17	A. Remitco.	10:34:27
18	Q. What about ACH?	10:34:27
19	A. I believe that -- I don't remember.	10:34:30
20	Q. Do you recall what -- were you able to access	10:34:42
21	Ex- -- Experian from a computer terminal?	
22	A. Yes.	10:34:50
23	Q. And do you recall what the products were that you	10:34:50
24	accessed through your computer terminal at Experian?	
25	A. I'm sorry. Can you repeat that?	10:34:58

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1	Q.	Do you recall what products you had access to?	10:35:00
2	A.	I just did a Social Security number search.	10:35:03
3	Q.	What kind of information was returned when you did	10:35:06
4		a Social Security number search on Experian?	
5	A.	It would have name, date of birth, other names	10:35:18
6		they may have gone by, spouse information if applicable,	
7		address history and current address, phone numbers, and	
8		current employers.	
9	Q.	Did it have any other credit information, other	10:35:41
10		credit that they had?	
11	A.	No.	10:35:46
12	Q.	I'm sorry. Do -- do you still process ACDVs?	10:35:55
13	A.	No.	10:35:59
14	Q.	Okay. When did you stop processing ACDVs?	10:36:00
15	A.	Late December of 2015.	10:36:05
16	Q.	Okay. So at the time that you were working as a	10:36:20
17		fraud analyst processing ACDVs, tell me -- how many other	
18		ACDV processors were there?	
19	A.	Two.	10:36:32
20	Q.	And who were they?	10:36:34
21	A.	Jennifer Schmitt and Jennifer Tabor.	10:36:36
22	Q.	Do you know Chantel Reed?	10:36:40
23	A.	I don't.	10:36:43
24	Q.	Have you ever heard the name Chantel Reed?	10:36:45
25	A.	Yes. Recently, yes.	10:36:49

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1	A.	I don't have an exact answer for that. Maybe 80,	10:49:44
2		80 to 100.	
3	Q.	Okay. So there's -- during this period of time,	10:49:52
4		there were two -- a total of three ACDV processers, you and	
5		Jennif- -- Jennifer and Jennifer?	
6	A.	Correct.	10:50:08
7	Q.	Right?	10:50:08
8	A.	Correct.	10:50:10
9	Q.	All right. And how many fraud investigators were	10:50:11
10		there?	
11	A.	Probably approximately 20.	10:50:24
12	Q.	Okay. And are all the cubicles filled with people	10:50:29
13		working?	
14	A.	During that time, no.	10:50:42
15	Q.	Okay. During that time, were you employed full	10:50:45
16		time by Credit One Bank?	
17	A.	Yes.	10:50:50
18	Q.	And were you an hourly employee or a salaried	10:50:56
19		employee?	
20	A.	Hourly.	10:51:01
21	Q.	And do you recall what your hourly wage was when	10:51:02
22		you started working at Credit One Bank?	
23	A.	\$15.00.	10:51:07
24	Q.	And did you receive any raises during that -- that	10:51:11
25		period between March of 2015 and December of 2015?	

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1	A.	Yes, I did.	10:51:18
2	Q.	And are you still an hourly employee?	10:51:19
3	A.	Yes, I am.	10:51:21
4	Q.	And what's your current wage?	10:51:23
5	A.	\$15.60.	10:51:25
6	Q.	And how do you -- like in the olden times, we used	10:51:32
7		to clock in. We'd take a time card and clock in.	
8		What -- what -- how is it done these days?	10:51:40
9	A.	It's done through the computer through our ADP	10:51:42
10		system. We log in username, password, and then hit clock	
11		in, and it clocks our time.	
12	Q.	Okay. And did you work in the same cube every	10:51:51
13		day?	
14	A.	Yes.	10:51:54
15	Q.	And now, do you still have that cube?	10:51:56
16	A.	Yes.	10:51:59
17	Q.	Okay. And so when you go in and you -- you log in	10:52:00
18		to ADP, what is the first thing that comes up on the screen	
19		after you log in?	
20	A.	The first thing is things like announcements,	10:52:16
21		employer discounts that you get for working for the	
22		employee. Across the top is different sections. I'm not --	
23		I'm not familiar with all of them. I just go straight to	
24		the one where I clock in.	
25	Q.	Okay. And then after you clock in, what do you	10:52:41

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1 do?

10:52:41

2 A. Is -- are you talking about currently or at the  
3 time that I was doing the ACDVs?

10:52:43

4 Q. Very good. I'm just still focused on the -- on  
5 the point in time when you were working on ACDVs, March  
6 through December. Well, we'll catch up to modern time in a  
7 couple of minutes.

10:52:50

8 A. Okay. At that time, I was logging in to -- I was  
9 setting up my screen for all of my investigation tools, all  
10 of the applications that I mentioned prior, as well as  
11 pulling up e-OSCAR to work from the queue for the ACDVs  
12 responding and investigating to them.

10:53:02

13 Q. When you say "investigation tools," and then you  
14 mentioned the applications that you mentioned before, is  
15 that the same thing? Are they applications, your  
16 investigation tools?

10:53:21

17 A. Yes.

10:53:29

18 Q. Are there any other investigation tools that you  
19 used that you didn't mention yet?

10:53:32

20 A. A system called P360. That is for any written  
21 correspondence that the customer provided to us. And  
22 occasionally a Google search, but not very often, and that's  
23 it.

10:53:48

24 Q. Okay. How -- when you conduct an investigation,  
25 how do you maintain the information about that

10:54:10

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1 investigation?

2 MR. SEARS: Objection as to form.

10:54:25

3 BY MS. ROTKIS:

10:54:31

4 Q. You may answer.

10:54:31

5 A. Can you repeat the question?

10:54:35

6 Q. When you conduct an investigation, how do you  
7 maintain the information about the investigation?

10:54:38

8 A. Maintain, like keep the information for my own  
9 records?

10:54:45

10 Q. Well, not for your own -- I'm just -- I'm  
11 wondering, you know, when you're conducting an  
12 investigation -- I don't know how many you do yet. We'll  
13 get to that in a minute. I'm really just looking for, like,  
14 when -- you know, I only have my own point of reference.  
15 I'm really just sorting this for the first time from you.  
16 When I'm doing an investigation, you know, I start out with  
17 the manila folder and then we go to binders and I'm still,  
18 you know, an ancient dinosaur. I have that on paper. I  
19 have some things electronically in a folder with my client's  
20 name on it, so I'm just asking you, like, how do you -- how  
21 do you do that? I mean, you're -- you know, you've  
22 mentioned all these different tools. I want to know how you  
23 put the investigation together, and if you maintain the  
24 information, how do you do it?

10:54:49

25 A. Well, I do the screenshots or snippets of it, and

10:55:27

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1 I take bits and pieces of where I found the information and 10:55:27  
2 compile it into a Word document for it to make sense so you  
3 can understand how -- how I linked the cardholder.

4 Q. And how did -- did you learn to do that? 10:55:46

5 A. How did I? Is that what you asked? 10:55:49

6 Q. Yes. How did you learn to do that? 10:55:52

7 A. That was taught by Traci Madura. We have an 10:55:55  
8 application, a snipping tool, that we can just snip out the  
9 parts of the screen we want and paste it into a document.

10 Q. Do you think that's something that Traci taught 10:56:13  
11 you to do -- is -- is that what she expects you to do when  
12 you conduct an investigation?

13 A. Yes. 10:56:23

14 Q. Okay. And is that -- is that expected of you when 10:56:26  
15 you investigate an ACDV, as well?

16 A. Yes. 10:56:31

17 Q. Okay. All right. So what's the first thing you 10:56:33  
18 did after you got your screen set up and you pulled up the  
19 OSCAR to look at the queue?

20 A. I pulled up and an ACDV is picked out random by 10:57:02  
21 the system, and then I look at the ACDV. I'm looking for --  
22 if there were any images provided by the credit reporting  
23 agencies. I'm looking at the information that was provided  
24 by the credit reporting agencies and then verifying if  
25 that's the information that we have in our system.

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1 Q. What information are you looking for specifically 10:57:39  
2 to verify that it's the information in your system?

3 A. Initially, I'm looking at things like addresses, 10:57:48  
4 Social Security matches, date of birth, prior addresses, as  
5 well. That's the investigation part of the ACDV. 10:59:17

6 Q. Anything else? 10:58:13

7 A. Dispute code. We want to know what they're 10:58:15  
8 disputing, if it's identity theft or account takeover, and  
9 that determines kind of how we work the case, as well.

10 Q. Okay. If the dispute code is identity theft, what 10:58:27  
11 do you do next?

12 A. Well, I'm verifying the information as I've 10:58:35  
13 mentioned, so I'm verifying the information that was  
14 provided to me, what we have on the account, you know, if it  
15 was the same information that was provided on the  
16 application, if it was once -- if it was at any point the  
17 information on the account if it isn't currently.

18 Q. Okay. And that would be Social Security number, 10:58:58  
19 right?

20 A. Social Security number, addresses and any previous 10:59:02  
21 addresses that were pro- -- provided on the ACDV, date of  
22 births, yes, like that.

23 Q. And name? 10:59:14

24 A. And name, yes. 10:59:16

25 Q. Okay. All right. And after you verify all that 10:59:17

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1 information in the investigation, what do you do for a 10:59:17  
2 dispute code? What did you do for dispute code of identity  
3 theft?

4 A. In -- we would -- if none of that information 10:59:46  
5 matched our system that was provided on the ACDV, if I  
6 couldn't verify, I would then go, you know, more thoroughly  
7 into it and look into our -- the other systems, such as  
8 Accurant, Experian, Remitco, try to find other ways to see  
9 if the cardholder once had that account or is it their  
10 account.

11 Q. Okay. So you would go into an additional system 11:00:28  
12 only if you had a mismatch in those items that you conducted  
13 the initial -- initial investigation; is that correct?

14 A. No, not necessarily, no. It wouldn't be where I 11:00:47  
15 stopped.

16 Q. Okay. What would -- if you -- if you did not have 11:00:53  
17 a mismatch in those four items of information that you  
18 mentioned, what would you do next?

19 MR. SEARS: Objection as to form of the question 11:01:05  
20 and mischaracterizes her testimony.

21 BY MS. ROTKIS: 11:01:13

22 Q. You may answer. 11:01:14

23 A. Can you repeat the question? 11:01:18

24 Q. If you did not have a mismatch in those four items 11:01:21  
25 of information that you used to conduct the initial

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1 investigation, what would you do next?

2 MR. SEARS: Same objection.

11:01:34

3 BY MS. ROTKIS:

11:01:39

4 Q. You -- you may answer.

11:01:41

5 A. I would verify the rest of the information on the  
6 account payment history and report it back to the credit  
7 reporting agencies appropriately.

11:01:47

8 Q. What would be the appropriate report back to a  
9 credit reporting agency if all the four items of information  
10 matched?

11:02:01

11 MR. SEARS: Objection as to form and  
12 mischaracterizes her previous testimony.

11:02:11

13 BY MS. ROTKIS:

11:02:31

14 Q. You may answer.

11:02:31

15 A. I would hold the cardholder responsible for that.

11:02:32

16 Q. Okay. So you would -- what is that called when  
17 you say -- do you have a special term of art if the  
18 cardholder is responsible?

11:02:35

19 A. Do I have a special what, I'm sorry?

11:02:43

20 Q. Term of art. Is there a special term that you --  
21 that you use in your industry when you say that the  
22 cardholder is responsible?

11:02:46

23 A. No.

11:02:54

24 Q. Okay. So if someone is claiming identity theft in  
25 an ACDV between March of 2015 and December of 2015, and all

11:02:57

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1 of the information matches your system, is there any way  
2 that it goes on to a secondary investigation?

3 MR. SEARS: Objection. Asked and answered.

11:03:20

4 THE WITNESS: Yes. If we receive another dispute,  
5 there would be another investigation.

11:03:34

6 BY MS. ROTKIS:

11:03:46

7 Q. Okay. About, on average, how many ACDVs would you  
8 have in your e-OSCAR queue per day?

11:03:49

9 MR. SEARS: Objection as to form. Calls for  
10 speculation.

11:04:04

11 MS. ROTKIS: Okay. Chris, I'm going to ask you to  
12 please refrain from these form speaking objections. You may  
13 object to form.

11:04:07

14 Q. You can speculate. You can guess how many you had  
15 per day. That's fine. Please answer the question.

11:04:15

16 A. Are you asking how many came through the queue per  
17 day or how many did I process a day?

11:04:22

18 Q. How many ACDVs would you usually process per day?

11:04:30

19 A. I would process anywhere between 80 to 100 a day.

11:04:34

20 Q. Do you know on average about how long it would  
21 take you to process each ACDV?

11:04:47

22 A. It varied. I would say the average would be about  
23 five minutes -- five, six minutes.

11:04:55

24 Q. How many hours per day did you work during that  
25 period of time?

11:05:27

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1	A.	It was an eight-hour workday.	11:05:30
2	Q.	What time did you arrive at work?	11:05:32
3	A.	6:00 a.m.	11:05:34
4	Q.	And what time did you clock out?	11:05:41
5	A.	2:30 p.m.	11:05:43
6	Q.	Were you able to take any breaks?	11:05:51
7	A.	Yes.	11:05:53
8	Q.	What -- what was the break schedule?	11:05:53
9	A.	The morning break was 15 minutes. We had a	11:05:56
10		30-minute lunch and then an afternoon break of 15 minutes.	
11	Q.	Did you clock out when you took your breaks and	11:06:13
12		your lunch?	
13	A.	Only my lunch. I would not clock out for breaks.	11:06:18
14	Q.	Do you have a break room at the office building?	11:06:27
15	A.	Yes.	11:06:29
16	Q.	Did you use the break room for your breaks?	11:06:38
17	A.	Sometimes, yes.	11:06:41
18	Q.	What else do you do on your break?	11:06:42
19	A.	Go outside and sit on the benches outside of the	11:06:44
20		entrance.	
21	Q.	What about for lunch? What did you usually do for	11:07:00
22		lunch?	
23	A.	I would usually be in the break room.	11:07:04
24	Q.	Do you usually bring your lunch?	11:07:09
25	A.	Yes.	11:07:11

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1 questions.

2 Q. Okay. And did they -- did Traci walk around to  
3 supervise the people that she supervised?

11:21:09

4 A. No.

11:21:20

5 Q. Or did she sit at her desk?

11:21:21

6 A. She was at her desk.

11:21:23

7 Q. Could she monitor your work remotely from her  
8 computer?

11:21:26

9 A. I don't know.

11:21:31

10 Q. Okay. Were you ever trained in Credit One  
11 policies regarding the Fair Credit Reporting Act?

11:21:34

12 A. No.

11:21:49

13 Q. Do you know what the Fair Credit Reporting Act is?

11:21:51

14 A. No.

11:21:56

15 Q. Do you know what ACDV stands for?

11:21:59

16 A. No.

11:22:09

17 Q. Other than -- do you know what a credit reporting  
18 agency is?

11:22:23

19 A. Yes.

11:22:27

20 Q. What is your understanding of credit reporting  
21 agencies?

11:22:28

22 A. It's an agency that collects data from creditors  
23 for the cardholder to report credit worthiness.

11:22:36

24 Q. What credit reporting agencies are you familiar  
25 with?

11:22:50

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1	A.	Experian, TransUnion, Equifax.	11:22:54
2	Q.	Does Credit One receive ACDVs from these credit	11:23:00
3		reporting agencies?	
4	A.	Yes.	11:23:06
5	Q.	Any other credit reporting agencies?	11:23:09
6	A.	No.	11:23:11
7	Q.	Do you have a telephone at your desk?	11:23:26
8	A.	I do.	11:23:28
9	Q.	When do you use your telephone?	11:23:28
10	A.	When I'm making -- during that time frame, I	11:23:37
11		didn't really use my phone.	
12	Q.	If -- do you recall ever using your phone to call	11:23:48
13		a consumer while you were investigating an ACDV?	
14	A.	I don't recall, no.	11:23:58
15	Q.	Do you know whether your telephone calls are	11:24:06
16		recorded when you're talking on your phone at your desk?	
17	A.	I don't know.	11:24:15
18	Q.	You mentioned earlier that sometimes you do a	11:24:21
19		Google search. Is Google accessible from your computer	
20		terminal?	
21	A.	Yes.	11:24:32
22	Q.	Have you received any security training about how	11:24:35
23		to keep your computer and keep the company safe when using	
24		the Internet?	
25	A.	Yes.	11:24:49

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1 Q. What kind of training have you received in that 11:24:49  
2 regard?

3 A. That was group training with head of security and 11:24:54  
4 he just went through the basics of, you know, them blocking  
5 account -- or I'm sorry, blocking Web sites that we 11:26:45  
6 shouldn't be accessing, not putting any passwords in, you  
7 know -- you know, things to that effect.

8 Q. Okay. Do you have Wi-Fi at your work? 11:25:15

9 A. Not that I'm aware of. 11:25:24

10 Q. Do you have a file cabinet at your cube? 11:25:27

11 A. I do. 11:25:34

12 Q. What do you have in your file cabinet? 11:25:34

13 A. I have notes, procedures, general office supplies, 11:25:36  
14 pens, paper, notebook, things like that.

15 Q. Can you recall what procedures you have in your 11:25:48  
16 file cabinet?

17 A. At that time, it would have been the ones that 11:25:56  
18 were printed out to me during training, which was for the  
19 Social Security number, ACDVs, address change, new  
20 applications.

21 Q. Do you think you still have that in your file 11:26:15  
22 cabinet?

23 A. I'm sure I do. I haven't thrown it away. 11:26:19

24 Q. Okay. Do you have access to any databases? 11:26:22

25 A. Can you give me an example or what do you mean? 11:26:45

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1	Q.	Okay. So for instance, when I look at this one, I	12:28:04
2		see a lot of the same fields. But just across the top, I	
3		don't see that search ACDV in the very top line.	
4	A.	Correct.	12:28:22
5		MR. SEARS: Wait for a question.	12:28:24
6		THE WITNESS: Oh, okay.	12:28:28
7		BY MS. ROTKIS:	12:28:29
8	Q.	All right. So I just want to go to a couple of	12:28:30
9		blocks that we haven't talked about. Do you know who	
10		processed this ACDV?	
11	A.	I did.	12:28:44
12	Q.	Okay. And do you know what date you processed it?	12:28:46
13	A.	April 28th.	12:28:52
14	Q.	Okay. And the dispute code, what does that tell	12:28:57
15		you?	
16	A.	It tells me that they are claiming the account was	12:29:02
17		fraudulently opened and that they're asking us --	
18	Q.	Okay.	12:29:10
19	A.	-- to validate the information.	12:29:10
20	Q.	Validate what information?	12:29:12
21	A.	The identification of the consumer.	12:29:19
22	Q.	Okay. Who is -- what credit reporting agency is	12:29:21
23		asking you to do this?	
24	A.	This is TransUnion.	12:29:31
25	Q.	Can you tell whether TransUnion provided any	12:29:37

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1	documents to you to perform your investigation?	12:29:37
2	A. On this printout, I cannot tell that, if they have	12:29:43
3	data provided.	
4	Q. In the block that says, "dispute information," the	12:29:50
5	third block down, says, "FCRA relevant information." And	
6	who would have filled that out?	
7	A. That would have been filled out by the customer or	12:30:06
8	the consumer.	
9	Q. Does the consumer have access to e-OSCAR?	12:30:11
10	A. I don't know.	12:30:17
11	Q. Who fills out dispute code 1?	12:30:24
12	A. The credit reporting agency.	12:30:27
13	Q. If a person provides a police report when they	12:30:40
14	claim true identity fraud, what do you do?	
15	A. I delete it due to fraud.	12:30:47
16	Q. Going down now to the account information section,	12:30:50
17	to the section that says, "CCC, compliance condition code	
18	XH," how did you resolve this dispute?	
19	A. Well, I validated the information again on the new	12:31:13
20	ACDV against what we had on the account. In this instance,	
21	although the FCRA relevant information mentioned a police	
22	report, there wasn't one provided. So I would have done	
23	another investigation on the secondary ACDV.	
24	Q. How do you know there was no police report	12:31:41
25	provided?	

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1           A.    Well, I would have opened the documents to verify   12:31:46  
2   whether or not there actually was a police report in the  
3   documents attached.

4           Q.    You previously told me that there was no way to   12:31:56  
5   tell me whether documents were attached to the other ACDV.   12:34:11  
6   How can you tell that there was no documents attached to  
7   this one?

8           A.    Well, based on the printout, I can't tell whether   12:32:08  
9   or not anything was provided.

10          Q.    Okay. Did you delete this account?   12:32:14

11          A.    No.   12:32:32

12          Q.    You performed this investigation on the same day   12:32:36  
13   that you performed the investigation that you got on the  
14   same person and the same account that was in Bates number --  
15   ACDV Bates number 48, right?

16          A.    Correct.   12:32:58

17          Q.    Let's see. If you'll go to page 53 -- oh, I'm   12:33:07  
18   sorry, let's go back to page 51 briefly.

19                I want to go back down to where it says account   12:33:32  
20   information, the bottom half of the page. If you go down to  
21   block, that says, "interest type indicator." And over in  
22   the response data area, it has a series of codes that says,  
23   "fraud with docs" and some numbers. Do you know what that  
24   means?

25               MR. SEARS: Objection, asked and answered.   12:34:11

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1	THE WITNESS: I don't. I've never seen that.	12:34:16
2	BY MS. ROTKIS:	12:34:21
3	Q. And -- okay. So it's your testimony that you did	12:34:22
4	not input this information into Bates number 51?	
5	A. I can't -- no, I don't think I did.	12:34:30
6	Q. And how do you know that you completed this ACDV	12:34:48
7	beginning at Bates number 51 and ending at Bates 52?	
8	A. How do I know I completed it?	12:34:58
9	Q. Yeah.	12:35:01
10	A. Well, my name is on it, and I responded back	12:35:06
11	saying that it was resolved.	
12	Q. Okay. Now, please turn over to page 53. And this	12:35:11
13	is -- can you tell what this is?	
14	A. This is another ACDV.	12:35:40
15	Q. And who did you receive this ACDV from?	12:35:47
16	A. Equifax.	12:35:50
17	Q. And how do you know it was from Equifax?	12:35:58
18	A. The subscriber code.	12:36:02
19	Q. Okay. And do you know when you processed this	12:36:08
20	ACDV?	
21	A. May 5th in 2015.	12:36:11
22	Q. Okay. And how do you know that you processed this	12:36:16
23	ACDV?	
24	A. Because the response date is May 5th, 2015.	12:36:21
25	Q. Okay. And the dispute code, what does that say to	12:36:24

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1	you?	12:36:24
2	A. That the account was fraudulently opened and it's	12:36:32
3	asking us to confirm the complete identification.	
4	Q. And if you go down to the block that says, "FCRA,	12:36:42
5	relevant information," it says, "Received from TUN on	12:38:48
6	5/1/2015." What does that mean to you?	
7	A. I'm not sure what TUN stands for, so I don't know.	12:36:59
8	Q. And you think that the consumer put that	12:37:11
9	information in there; is that correct?	
10	A. That's what I think, yes.	12:37:16
11	Q. The -- going down now to the block that says,	12:37:22
12	"consumer information," it has "ECOA code." The request	
13	data is for individual. And the response you provided --	
14	what was the response you provided?	
15	A. Individual.	12:37:40
16	Q. Okay. Now, going back to page 51, if you look at	12:37:45
17	the ECOA response code -- I'm sorry, the ECOA code, and it	
18	requests -- the request data says, "individual." And what	
19	was your response?	
20	A. Individual.	12:38:03
21	Q. Okay. All right. Now, going over to the CCC, the	12:38:05
22	compliance condition code and account information, what	
23	compliance condition code did you put in there?	
24	MR. SEARS: What page are you on now?	12:38:45
25	MS. ROTKIS: Fifty-three.	12:38:48

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1	MR. SEARS: Okay.	12:38:50
2	THE WITNESS: I provided an XH which means it was	12:38:50
3	in dispute, but it's been resolved and that we're reporting	
4	it back to the CRA.	
5	BY MS. ROTKIS:	12:39:00
6	Q. And under what conditions would you report an XB	12:39:00
7	compliance condition code?	
8	A. If there wasn't an immediate resolution, if it was	12:39:06
9	an active account with the bank and we had to process the	
10	loss stolen and do an investigation that way.	
11	Q. Going down now to "interest type indicator." In	12:39:21
12	the response code, there are, again, some numbers, some	
13	commas, the word "fraud." Does that mean anything to you?	
14	A. I've never seen that.	12:39:38
15	Q. And again, that's your -- it's your testimony that	12:39:42
16	you would not have put that in there?	
17	A. I don't recall putting it in there. I don't	12:39:47
18	recall ever doing that.	
19	Q. Okay. Turning now to page 55. Do you know what	12:39:54
20	this is?	
21	A. It's another ACDV.	12:40:12
22	Q. And can you tell where you got this ACDV from?	12:40:16
23	A. In this instance, it would be Experian.	12:40:21
24	Q. How do you know it's Experian?	12:40:30
25	A. The subscriber code.	12:40:33

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1 Q. And what is the dispute code? 12:40:35

2 A. That they're claiming the account was fraudulently 12:40:40  
3 opened and they're asking us to confirm the complete  
4 identification of the consumer.

5 Q. And what about "FCRA relevant information," what 12:40:53  
6 does that mean?

7 A. I don't know. 12:41:07

8 MR. SEARS: I'm assuming that you mean what is in 12:41:09  
9 the box there as opposed to what the FCRA relevant  
10 information itself means, the dashes in the box? All right.  
11 I'm going to object to --

12 BY MS. ROTKIS: 12:41:25

13 Q. Ms. Chu, do you understand there's -- there's a 12:41:26  
14 field that's next to the block that says, rele- -- "FCRA  
15 relevant information," and it has -- it's either like a  
16 bunch of ones or just some -- some marks in that -- in that  
17 block. Do you understand what those -- those marks  
18 reference?

19 A. No. 12:41:45

20 Q. Okay. And it's your understanding that the 12:41:46  
21 consumer would have put those marks in that block; is that  
22 correct?

23 A. That's my understanding, yes. 12:41:55

24 Q. Where did you get your understanding that the 12:41:57  
25 consumer would have put that information into that block?

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1           A.    From my understanding, it is -- I don't know if           12:42:05  
2   they physically put it in or if they are notes that they are  
3   providing the CRAs to tell us. But from my understanding,  
4   they're notes from the customer, from Traci Madura just  
5   asking, you know, what it was. They're just notes for           12:43:35  
6   additional reference.

7           Q.    Have you ever seen an actual consumer dispute           12:42:32  
8   letter included with the documents that you receive from  
9   e-OSCAR?

10          A.    An actual dispute letter? I mean, with the docs,           12:42:39  
11   yeah, there would be a letter. There are sometimes letters  
12   from the consumers saying that it's not theirs, that it's  
13   fraud. They might include an affidavit stating the same  
14   thing.

15          Q.    Okay. Can you tell from this ACDV whether any           12:42:56  
16   documents were included?

17          A.    From the printout, I cannot tell.           12:43:03

18          Q.    Okay. Going down to the consumer information           12:43:10  
19   block all the way down to the block that says, "ECOA code"?

20          A.    Um-hmm.           12:43:18

21          Q.    The request is whether it's individual, one           12:43:19  
22   individual. And your response, what was your response?

23          A.    It was also individual.           12:43:26

24          Q.    What date did you resolve this ACDV?           12:43:31

25          A.    I resolved it on June 10th of 2015.           12:43:35

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1	Q.	And would you agree that the compliance condition	12:43:57
2		code still says, "XH"?	
3	A.	Yes.	12:44:02
4	Q.	Under what circumstances would you change that	12:44:08
5		compliance condition code to something else?	12:46:02
6	A.	If it was still an active account with the bank,	12:44:18
7		then the other option would be an XB to let them know that	
8		it was received and we're working on it.	
9	Q.	As long as an account is charged off, would you	12:44:31
10		ever change the compliance condition code to XB?	
11	A.	No.	12:44:40
12	Q.	Going down now to the interest type indicator. If	12:44:43
13		you look over in the right column for response data, do you	
14		know what any of those responses are?	
15	A.	I -- I haven't -- I'm not familiar with that. No,	12:44:58
16		I don't know.	
17	Q.	Okay. And like the other ACDVs, you did not put	12:45:03
18		those codes or that information in that response data field?	
19	A.	No.	12:45:12
20	Q.	Are there any other ACDVs that you're familiar	12:45:27
21		with that you processed for David Wood?	
22	A.	No.	12:45:34
23	Q.	Going to page 59, it's under tab 4, do you know	12:45:46
24		what this is?	
25	A.	These are notes on the account from CAS.	12:46:02

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1	Q.	Why don't you just take a couple of minutes and	12:46:07
2		look through these notes.	
3	A.	Okay.	12:46:29
4	Q.	Would it be fair to say that these notes actually	12:46:37
5		start on page 65 and go to -- in descending order to	12:47:50
6		page 59?	
7	A.	Yes.	12:46:54
8	Q.	Do you know how to read this document?	12:46:55
9	A.	I'm familiar with it, yes.	12:47:00
10	Q.	Do you have access to this document?	12:47:03
11	A.	Yes.	12:47:07
12	Q.	Okay. And does this printout look like the	12:47:09
13		document that you would see in CAS?	
14	A.	Yes.	12:47:15
15	Q.	Okay. Is there anything missing from this	12:47:17
16		document that you would see when you looked at your screen	
17		in CAS?	
18	A.	In regards to the notes, no.	12:47:25
19	Q.	That's how the notes appear when you look at the	12:47:30
20		screen?	
21	A.	Yes.	12:47:33
22	Q.	Okay. Are there any other things like any	12:47:33
23		commands or any toolbars or anything on the screen?	
24	A.	No.	12:47:49
25	Q.	Do you ever have occasion to print out the notes	12:47:50

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1	from CAS?	12:47:50
2	A. No.	12:47:55
3	Q. Okay. So starting with page 65, it looks like the	12:47:56
4	first entry is on June 11th of 2013. And so the first	
5	column looks like it has the date and the time; is that	12:49:17
6	correct?	
7	A. Yes.	12:48:21
8	Q. Okay. And how is that date and time recorded, do	12:48:23
9	you know?	
10	A. At the time that the note was put in, it would	12:48:29
11	time-stamp out.	
12	Q. So does the -- do you ever put notes into the	12:48:33
13	system?	
14	A. Yes.	12:48:37
15	Q. Okay. And does that happen automatically, that	12:48:39
16	the date and the time get stamped when you put a note in?	
17	A. Yes.	12:48:50
18	Q. Okay. And so -- and then the next column looks	12:48:51
19	like it says, "agent"; is that fair?	
20	A. Yes.	12:48:56
21	Q. And who is agent 1?	12:48:56
22	A. I don't know.	12:49:05
23	Q. Okay. And the next column says, "call type."	12:49:05
24	What does that mean?	
25	A. It's the type of request that comes through on the	12:49:17

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1	account from my understanding.	12:49:17
2	Q. Okay. What does "work case history" mean?	12:49:22
3	A. I'm not exactly sure.	12:49:27
4	Q. Okay. Do you know what the next column result is?	12:49:30
5	A. That's usually just where our notes show up at.	12:49:36
6	Q. Okay. Do you know what "adjust fee dash R closed"	12:49:41
7	means?	
8	A. It would mean that there was a fee that was	12:49:48
9	adjusted on the account and that that issue has been	
10	resolved.	
11	Q. Okay. Then the next entry is on June 14th of	12:49:56
12	2013. Do you know who Agent 311633987 is?	
13	A. No, I don't.	12:50:11
14	Q. Do you have an agent number?	12:50:12
15	A. I do.	12:50:16
16	Q. What is your agent number?	12:50:16
17	A. My agent number is 312949906.	12:50:29
18	Q. Is there anything on page 55 or 56 that tells you	12:50:46
19	whether this application was reviewed by somebody in the	
20	fraud investigation department?	
21	A. No, it wouldn't show in CAS notes.	12:50:58
22	Q. Oh, where does that show up?	12:51:01
23	A. That shows in CAPS.	12:51:03
24	Q. Okay. Looking through these notes, are there any	12:51:06
25	notes or any entries that you've made in this case history?	

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1	A.	Yes.	12:51:41
2	Q.	Can you please tell me what page that's on?	12:51:42
3	A.	That began on page 61.	12:51:53
4	Q.	Okay. And is it 42861 at 8:22 a.m.?	12:52:08
5	A.	Yes.	12:52:14
6	Q.	Okay. And how do you enter the information into	12:52:16
7	CAS?	Did you type all this information in the result	
8	field --		
9	A.	Yes.	12:52:27
10	Q.	-- or did you copy and paste it from the ACDV?	12:52:27
11	Okay.		
12	A.	Well, there's a template. I copy and paste the	12:52:31
13	dispute code, which is 103 claims true identity, fraud		
14	account fraudulently opened. Everything else is typed in.		
15	Q.	Okay. So what does CH mean?	12:52:43
16	A.	Cardholder.	12:52:52
17	Q.	Okay. So at the very top of this entry, it looks	12:52:53
18	like the first line says, "RCVD." What does that mean?		
19	A.	Received.	12:53:01
20	Q.	Okay. The next one is "ACDV." What does that	12:53:04
21	mean?		
22	A.	I don't know exactly what it stands for.	12:53:11
23	MR. SEARS:	Objection.	12:53:15
24	BY MS. ROTKIS:		12:53:15
25	Q.	Okay. But this is the ACDV that we've been	12:53:16

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1	talking about?	12:53:16
2	A.    Yes.	12:53:19
3	Q.    Okay.  And would you -- would you trust me -- we	12:53:20
4	don't have -- this is not really relevant, but it just helps	
5	us avoid this objection in the future.  It stands for	
6	Automated Consumer Dispute Verification.  And in olden times	
7	we just used to call it a CDV, it's Consumer Dispute	
8	Verification, but now it's automated through e-OSCAR.  Okay.	
9	So you received an ACDV.  And then what's the next -- next	
10	bit of that sentence, that note?  What does it say?	
11	A.    It's saying that there were images included from	12:53:55
12	Equifax.	
13	Q.    Okay.  And what does that mean to you?	12:54:02
14	A.    It means that there were documents attached to the	12:54:04
15	ACDV at the time I brought it up.	
16	Q.    Okay.  And that's -- that's something that you	12:54:10
17	wrote in there, right?	
18	A.    Right.	12:54:15
19	Q.    Okay.  And you wrote that at the time that you	12:54:15
20	resolved that dispute, right?	
21	A.    Right.	12:54:20
22	Q.    Okay.  And then going down here a little bit more,	12:54:21
23	"103 claims true identity fraud, account fraudulently	
24	opened, CH" -- meaning cardholder -- "claims ID theft."	
25	What does ADRS mean?	

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1	A.	Address.	12:54:36
2	Q.	Okay. PROV?	12:54:37
3	A.	Provided.	12:54:40
4	Q.	Okay. By, just the word by?	12:54:43
5	A.	Yeah.	12:54:46
6	Q.	Okay. CH, cardholder.	12:54:47
7		Why don't you go through and just tell me what the	12:54:51
8		rest of this note says?	
9	A.	It's saying that the address provided by the	12:54:56
10		cardholder matches what we have on file in CAS and CASH.	
11		It's also telling you that the address provided on the	
12		application through CAPS -- which isn't noted, I'm sorry --	
13		the address provided on that application. And then I	
14		provided the address that was on the application links to	
15		cardholder through Accurint. So my final decision --	
16	Q.	Okay.	12:55:25
17	A.	-- was the cardholder was responsible. And then	12:55:25
18		it has the control number for reference, and then those are	
19		just my initials and my department at the end.	
20	Q.	Okay. And so based on this note, would it be fair	12:55:34
21		to say that you verified that the cardholder was responsible	
22		because of the address matches?	
23	A.	Yes.	12:55:54
24	Q.	All right. Do you see any other notes that you	12:55:59
25		entered?	

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